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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

JESSICA MURCH, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

KEYSTONE REMODELING, INC.

and

**ISRAEL BASAN CONSULTING, INC.
D/B/A NEARME ROOFING**

Defendants.

Case No.

3:25-cv-64

REQUEST FOR
ENTRY OF DEFAULT
TCPA (47 U.S.C. § 227)
DEMAND FOR JURY TRIAL

**REQUEST FOR CLERK'S ENTRY OF DEFAULT
AGAINST DEFENDANT ISRAEL BASAN CONSULTING, INC.**

COMES NOW Plaintiff Jessica Murch, by and through the undersigned counsel, pursuant to FED. R. CIV. P. 55(a), and hereby files this Motion for Clerk's Entry of Default against Defendant Israel Basan Consulting, Inc. in the above-styled action. Plaintiff respectfully requests that the Clerk of Court enter default as the Defendant has failed to serve or file an answer to Plaintiff's claims in this action within the time permitted by law or otherwise.

Federal Rule of Civil Procedure 12(a), entitled "Time to Serve a Responsive Pleading," provides in pertinent part that "[a] defendant must serve an answer within 21 days after being Request for Entry of Default

served with the summons and complaint.” FED. R. CIV. P. 12(a)(1)(A)(i). Federal Rule of Civil Procedure 55(a), entitled “Entering a Default,” provides that “[w]hen a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk *must* enter the party’s default.” FED. R. CIV. P. 55(a) (emphasis added).

Here, the Plaintiff filed her Amended Complaint naming Israel Basan on June 17, 2025. (See ECF No. 9.) Defendant Israel Basan was served with the Summons and Complaint through sub-service on the Washington Secretary of State on July 3, 2025. (See ECF No. 13.) Accordingly, Defendant’s responsive pleading was due on July 24, 2025. Defendant did not file a response as of August 17, 2025. Accordingly, the Plaintiff requests that the Clerk enter the Defendant’s default pursuant to FED. R. CIV. P. 55(a).

The Plaintiff intends to move for leave for an additional month to finalize the classwide discovery and seek a classwide default judgment as to both Defendants.

CONCLUSION

WHEREFORE, for the reasons set forth herein, the Plaintiff respectfully requests that the Clerk of Court enter default against the Defendant pursuant to FED. R. CIV. P. 55(a).

RESPECTFULLY SUBMITTED AND DATED this August 17, 2025.

/s/ Andrew Roman Perrong
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 Lead Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I certify that I filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case.

I further certify that I mailed a copy of the foregoing to:

Israel Basan Consulting, Inc.
16915 NE 22ND PL
BELLEVUE, WA, 98008

Dated: August 17, 2025

/s/ Andrew Roman Perrong

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